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October 27, 2023

VIA ECF

Hon. Edgardo Ramos
Thurgood Marshall United States Courthouse
40 Foley Square, Courtroom 619
New York, NY 10007

MEMO ENDORSED

Re: *Koutsoudakis and Iakovou Law Group, PLLC v. Bulent Osman, Joseph Auddino, Esq. and J. Streicher, LLC*
Case No.: 1:22-cv-06351-ER
FKB File No.: 332.021
First Letter Motion for an Extension to Move to Dismiss Amended Complaint

Dear Judge Ramos:


Our firm represents defendant Joseph Auddino, Esq. in this matter. Pursuant to Your Honor's Individual Practice Rule 1(E), we respectfully submit this letter seeking a 7-day extension of time to submit moving papers in support of our motion to dismiss Plaintiff's First Amended Complaint from October 30, 2023, through November 6, 2023.

This Court's October 6, 2023 briefing schedule directed our motion papers to be filed by October 30, 2023; Plaintiff's opposition to be filed by November 20, 2023; and our reply to be filed by November 27, 2023. So that Plaintiff has sufficient time to oppose our motion (and in consideration of the Thanksgiving holiday), we would request that Plaintiff's opposition deadline be extended to December 1, 2023, and our reply deadline be extended to December 8, 2023.

Because of concurrent litigation deadlines and an illness recently affecting me and my family, we reached out to Plaintiff's counsel yesterday (10/26) and today (10/27) by phone and e-mail requesting counsel's consent to modify the briefing schedule, but Plaintiff's counsel has not yet responded to our request.

We thank the Court for its consideration.

The motion for an extension is granted. The briefing schedule for Auddino's motion to dismiss will be as follows: moving papers due November 6, 2023; opposition due December 1, 2023; and reply due December 8, 2023. SO ORDERED.


Edgardo Ramos, U.S.D.J.
Dated: October 30, 2023
New York, New York

Respectfully submitted,

FURMAN KORNFELD & BRENNAN LLP

/s/ Aaron M. Barham

Aaron M. Barham

cc: All counsel of record (via ECF)